

October 28, 2004

NEF#04-046

ATTN: Document Control Desk
Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Louisiana Energy Services, L. P.
National Enrichment Facility
NRC Docket No. 70-3103

Subject: Clarifying Information Related to Items Relied On For Safety

- References:
1. Letter NEF#03-003 dated December 12, 2003, from E. J. Ferland (Louisiana Energy Services, L. P.) to Directors, Office of Nuclear Material Safety and Safeguards and the Division of Facilities and Security (NRC) regarding "Applications for a Material License Under 10 CFR 70, Domestic licensing of special nuclear material, 10 CFR 40, Domestic licensing of source material, and 10 CFR 30, Rules of general applicability to domestic licensing of byproduct material, and for a Facility Clearance Under 10 CFR 95, Facility security clearance and safeguarding of national security information and restricted data"
 2. Letter NEF#04-002 dated February 27, 2004, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Revision 1 to Applications for a Material License Under 10 CFR 70, "Domestic licensing of special nuclear material," 10 CFR 40, "Domestic licensing of source material," and 10 CFR 30, "Rules of general applicability to domestic licensing of byproduct material"
 3. Letter NEF#04-029 dated July 30, 2004, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Revision to Applications for a Material License Under 10 CFR 70, "Domestic licensing of special nuclear material," 10 CFR 40, "Domestic licensing of source material," and 10 CFR 30, "Rules of general applicability to domestic licensing of byproduct material"

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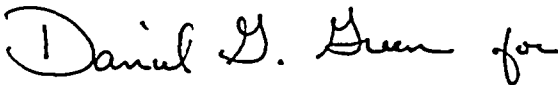
4. Letter NEF#04-037 dated September 30, 2004, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Revision to Applications for a Material License Under 10 CFR 70, "Domestic licensing of special nuclear material," 10 CFR 40, "Domestic licensing of source material," and 10 CFR 30, "Rules of general applicability to domestic licensing of byproduct material"

By letter dated December 12, 2003 (Reference 1), E. J. Ferland of Louisiana Energy Services (LES), L. P., submitted to the NRC applications for the licenses necessary to authorize construction and operation of a gas centrifuge uranium enrichment facility. Revision 1 to these applications was submitted to the NRC by letter dated February 27, 2004 (Reference 2). Subsequent revisions (i.e., revision 2 and revision 3) to these applications were submitted to the NRC by letters dated July 30, 2004 (Reference 3) and September 30, 2004 (Reference 4), respectively.

In an October 19, 2004, conference call between LES and NRC representatives, the NRC requested that clarifications be provided concerning Items Relied on For Safety. The information concerning Items Relied on For Safety, in the form of commitments to specific industry standards, guidance documents, and regulatory guides, is included in the Enclosure, "Clarifying Information Related to Items Relied On For Safety." This information will be formally incorporated into the Integrated Safety Analysis Summary in a future revision.

If you have any questions or need additional information, please contact me at 630-657-2813.

Respectfully,

A handwritten signature in cursive script that reads "Daniel G. Green for".

R. M. Krich
Vice President – Licensing, Safety, and Nuclear Engineering

Enclosure:
Clarifying Information Related to Items Relied On For Safety

cc: T.C. Johnson, NRC Project Manager

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ENCLOSURE

Clarifying Information Related to Items Relied On For Safety

Clarifying Information Related to Items Relied On For Safety

In addition to the commitments related to Items Relied On For Safety (IROFS) currently reflected in the National Enrichment Facility (NEF) Integrated Safety Analysis Summary, the applicable guidance of the following industry standards, guidance documents and regulatory guides shall be used for the design, procurement, installation, testing, and maintenance of IROFS at the NEF.

1. Institute of Electrical and Electronics Engineers (IEEE) standard IEEE 603-1998, "IEEE Standard Criteria for Safety Systems for Nuclear Power Generating Stations"
2. IEEE standard 384-1992, "IEEE Standard Criteria for Independence of Class 1E Equipment and Circuits"
3. Branch Technical Position HICB-11, "Guidance on Application and Qualification of Isolation Devices," Revision 4, June 1977, from NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants"
4. Regulatory Guide 1.75, "Physical Independence of Electric Systems," Revision 2, September 1978
5. IEEE standard 344-1987, "IEEE Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations"
6. Regulatory Guide 1.100, "Seismic Qualification of Electric and Mechanical Equipment for Nuclear Power Plants," Revision 2, June 1988
7. American National Standards Institute (ANSI)/Instrumentation, Systems, and Automation Society (ISA)-S67.04-1994, Part 1, "Setpoints for Nuclear Safety-Related Instrumentation"
8. Regulatory Guide 3.17, "Earthquake Instrumentation for Fuel Reprocessing Plants," February 1974 (for IROFS26 only)
9. IEEE standard 338-1987, "IEEE Standard Criteria for Periodic Surveillance Testing of Nuclear Power Generating Station Safety Systems"
10. Branch Technical Position HICB-17, "Guidance on Self-Test and Surveillance Test Provisions," Revision 4, June 1977, from NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants"
11. Regulatory Guide 1.118, "Periodic Testing of Electric Power and Protection Systems," Revision 3, April 1995
12. IEEE standard 518-1982, "IEEE Guide for Installation of Electrical Equipment to Minimize Electrical Noise Inputs to Controllers from External Sources"
13. IEEE standard 1050-1996, "IEEE Guide for Instrumentation and Control Equipment Grounding in Generating Stations"
14. IEEE standard 279-1971, "Criteria for Protection Systems for Nuclear Power Generating Stations" (for separation and isolation)